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**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE: §
§
Barbara Phetsavang Koumphonpakdy § **CASE No. 20-43672-elm-13**
§
Debtor § **CHAPTER 13**

MOTION TO VACATE DISMISSAL ORDER AND REINSTATE CHAPTER 13 CASE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW BEFORE THE COURT, Barbara Phetsavang Koumphonpakdy , Debtor in the above-numbered and styled cause, and files this her Motion to Reinstate Chapter 13 Case, and would respectfully show the Court as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b)
2. Debtor filed for Bankruptcy protection under Chapter 13 of Title 11, United States Code on 12/2/2020.
3. Debtor's case was dismissed on 1/15/2021 as a result of material default. Debtor had fallen behind on payments to the Chapter 13 Trustee.
4. Debtor understands that if the Court grants this Motion and allows the case to be reinstated, all payments to the Chapter 13 Trustee must be current.
5. Debtor is eligible for relief under Chapter 13 of the United States Code.

6. Debtor respectfully requests this Court grant this request to reinstate her Chapter 13 case to this Court's active docket.

7. It was necessary for Debtor(s) to utilize the services of counsel, Leinart Law Firm, to present this motion. Debtor(s) request that Leinart Law Firm be allowed reasonable attorney fees for the representation in the amount of \$200.00, which the Debtors have paid directly to counsel. Debtors' counsel has placed these funds in an IOLTA trust account. (!ONLY FOR POST-CONF CASES!)

WHEREFORE, PREMISES CONSIDERED, Debtor Barbara Phetsavang Koumphonpaky prays the Court order her Chapter 13 case be reinstated to this Court's active docket, and for such other and further relief as the Court deems just.

DATED: January 19, 2021

Respectfully Submitted,

Leinart Law Firm
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By: /s/ Marcus Leinart
Marcus Leinart
State Bar No. 00794156
ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2021, I did serve a true and correct copy of the foregoing to the following interested parties, and to those parties listed on the matrix as filed with the Court, by United States Mail, First Class:

Barbara Phetsavang Koumphonpakdy
6916 Gillis Johnson Street
Fort Worth, TX 76179

Office of the Standing Chapter 13 Trustee
6851 N.E. Loop 820, Ste 310
N. Richland Hills, TX 76180-6608

United States Trustee
1100 Commerce, Rm 976
Dallas, TX 75242

/s/ Marcus Leinart
Marcus Leinart
Attorney for Debtor